

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
EUDIS MANUEL SOSA	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
EUDIS MANUEL SOSA	:	CASE NO. 5-24-bk-01476
Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 19th day of November 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. § 1322(a)(2) in that the Debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507 (Claims 1 and 4).
2. Statement of Financial Affairs #27 lacks description.
3. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid – 100% Plan.
4. The Debtor has not demonstrated that all tax returns have been filed as required by §1325(a)(9), specifically, 2020, 2021 and 2022 Federal. The Trustee has filed a concurrent Motion to Dismiss for failure to file these returns.
5. The Debtor has not provided the Trustee with information needed in order for the Trustee to comply with § 1302(b)(6).
6. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
  - a. The Debtor has not provided to the Trustee complete copies of the 2023 Federal Income Tax returns as required by § 521(e)(2)(A).
  - b. Six (6) month Profit and Loss Statement for January through June 2024.

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WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19th day of November 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

TULLIO DeLUCA, ESQUIRE  
381 N 9TH AVENUE  
SCRANTON, PA 18504-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee